

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

-----X  
In re:

BRIAN H. DENKER  
Debtor

Chapter 11  
Case Number 15-41069

-----X  
Brian H. Denker-Youngs,  
*Plaintiff*

v.

Lawrence Morrison, Morrison Tenenbaum, PLLC  
*Defendant*

COMPLAINT FOR AN  
PRELIMINARY INJUNCTION  
AND RESTRAINING ORDER

Jacquelyn Somers Loftin, LaMonica Herbst Maniscalco  
counsel to non-debtor spouse Edward J Denker-Youngs  
*Defendant*

**ORDER TO SHOW CAUSE FOR PRELIMINARY INJUNCTION  
AND TEMPORARY RESTRAINING ORDER**

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CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF  
NEW YORK

UPON the affidavit of the debtor, BRIAN H. DENKER-YOUNGS, sworn to this

5<sup>th</sup> day of OCTOBER, 2015 and upon copy of the complaint hereto annexed, it is

**ORDERED**, that the above named defendant show cause before a motion term of this Court, before the Honorable Carla E Craig, United States Bankruptcy Judge at the United States Bankruptcy Court for the Eastern District of New York, located at 271 Cadman Plaza East, Courtroom 3529, Brooklyn, New York 11201, on the \_\_\_\_\_ day of \_\_\_\_\_, 2015 at \_\_\_\_\_ o'clock in the \_\_\_\_\_ noon thereof, or as soon thereafter as counsel may be heard, why an order staying the conversion of this proceeding pursuant to 11 U.S.C. 1112(a) should not be granted along with any and other further relief as this Court deems just and proper; it is further

**ORDERED**, that objection, if any to the relief herein requested should be in writing, shall state with particularity the grounds for the objection, shall be filed with the Clerk of the Bankruptcy Court and served upon, the undersigned counsel for the applicant by 5:00p.m. Seven days prior to the return date and upon any other person whose interests would be affected if the objection is sustained; it is further

**ORDERED**, pending a return before this court for a hearing on the matter within, all proceedings converting debtors petition from 11 to 7 are hereby stay, and further

**ORDERED**, all Suffolk County Supreme Court proceeds in Index No. 169698-2014 are stayed until further notices, and it is

**ORDERED**, that the Second Department, Appellate Court Division may proceed with their review and appeal of the matters held in abeyance before them; and it is further

**ORDERED** that overnight service of a copy of this Order and the papers upon which it is granted on (a) the United States Trustee; (b) counsel to the debtor and creditors who have served on the Debtor and have filed with this Court a request for notice in this case, and by United States First Class mail (c) all creditors of the debtor (d) all relevant taxing authorities.

Date: New York, New York

October \_\_\_\_\_, 2015

**HONORABLE CHIEF JUSTICE CARLA E. CRAIG**  
**UNITED STATES BANKRUPTCY COURT**